UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION)))	MDL NO. 1456 CIVIL ACTION NO. 01-CV-12257-PBS
THIS DOCUMENT RELATES TO ALL ACTIONS))))	Hon. Patti B. Saris

TRACK 1 DEFENDANTS' JOINT PRETRIAL DISCLOSURES PURSUANT TO FED R. CIV. P. 26(a)(3)(A)

TRACK 1 DEFENDANTS' JOINT WITNESS LIST

The Track 1 Defendants reserve the right to call any witnesses identified by Plaintiffs on their list of trial witnesses to be called live. Additionally, as Blue Cross Blue Shield of Massachusetts and other third-party payors are continuing to produce witnesses for deposition, the Track 1 Defendants reserve their right to supplement this witness list with additional witnesses to appear both live and by designation.

A. WITNESSES TO BE CALLED LIVE AT TRIAL

Name, Address & Phone Number	Will Call	May Call
Sheila Cizauskas	X	
Director of Provider Contracting		
Blue Cross Blue Shield of Massachusetts		
c/o Stephen Coco, Esq.		
Robins, Kaplan, Miller & Ciresi LLP		
800 Bolyston St., 25 th Floor		
Boston, MA 02199		
(617) 627-2300		

Name, Address & Phone Number	Will Call	May Call
John Killion	X	j
Senior Director for Ancillary Services		
Blue Cross Blue Shield of Massachusetts		
c/o Stephen Coco, Esq.		
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800 Bolyston St., 25 th Floor		
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Deborah Devaux		X
Senior Vice President for Health Care Contract Management		
Blue Cross Blue Shield of Massachusetts		
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Robins, Kaplan, Miller & Ciresi LLP		
800 Bolyston St., 25 th Floor		
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James Fanale		X
Former Chief Medical Officer		71
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Edward S. Curran, Jr.	X	
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Norwood, MA 02062		
(781) 762-9376		
Gary Shramek	X	
•	Λ	
c/o Hogan & Hartson L.L.P.		
875 Third Avenue		
New York, NY 10022		
(212) 918-3000		V
Ken Arruda		X
c/o Stephen Coco, Esq.		
Robins, Kaplan, Miller & Ciresi LLP		
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Boston, MA 02199		
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Stanley Weintraub		X
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Baltimore, MD 21209		
(202) 496-0200 x805		

Name, Address & Phone Number	Will Call	May Call
Thomas A. Scully		X
Alston & Bird		
The Atlantic Building		
950 F Street, NW		
Washington, DC 20004		
(202) 756-3459		
Jessica Smith		X
Director of Statistical Services		
IMS Health Incorporated		
660 West Germantown Pike		
Plymouth Meeting, PA 19462		
(610) 834-5000		
Christopher C. Jennings		X
Jennings Policy Strategies, Inc.		
1001 G Street, NW		
Suite 700 East		
Washington, DC 20001		
(202) 879-9344	***	
Greg Bell	X	
CRA International		
John Hancock Tower		
200 Clarendon St. T-33		
Boston, MA 02116 (617) 425-3000		
Tim Snail		X
CRA International		Λ
John Hancock Tower		
200 Clarendon St. T-33		
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Eric Gaier	X	
Bates White LLC		
2001 K Street NW		
Suite 700		
Washington, DC 20006		
(202) 408-6110		
Dr. Linda Haegele	X	
9600 Roosevelt Blvd.		
Suite 301		
Philadelphia, PA 19115		
(215) 677-8150		
Daniel L. McFadden	X	
The Brattle Group, Inc.		
353 Sacramento St., Suite 1140		
San Francisco, CA 94111		
(415) 217-1000		

B. WITNESSES TO BE OFFERED BY DEPOSITION

Name & Employer
Theresa Jernigan
Sheet Metal Workers
Lisa Gorman
Blue Cross Blue Shield of Massachusetts
Maureen Coneys
Blue Cross Blue Shield of Massachusetts
Vincent Plourde
Blue Cross Blue Shield of Massachusetts
Robert Jackson, Jr.
Aetna
Susan Johnson
Aetna
Joseph Spahn
Anthem Blue Cross Blue Shield
Timothy J. Miller
Anthem Blue Cross Blue Shield
David B. Morris
Anthem Blue Cross Blue Shield
John B. Syer, Jr.
Anthem Blue Cross Blue Shield
Hal Goldman
Beacon/Vista Healthplan
Paula Pfankuch
Blue Cross Blue Shield Illinois
Mickey Brown
Blue Cross Blue Shield Mississippi
Jill S. Herbold
Cigna
Russell Hailey
Coventry Health Care, Inc.
Bruce M. Niebylski
Health Alliance Plan
Karen Ferro
HealthNet Pharmaceutical Services
Michael Baca
HealthNet Pharmaceutical Services
Karla A. Austen
HealthNet Pharmaceutical Services
Mike Beaderstadt
Heritage National Health Plan
Margaret M. Johnson
Horizon Blue Cross Blue Shield

Name & Employer
Susan Mengert
Horizon Blue Cross Blue Shield
William K. Fleming
Humana
Gary Owens, MD
Independence Blue Cross
Eric Cannon
Intermountain Healthcare
Dale Kramer
Kaiser Permanente in Northern California
David W. Thomas
Three Rivers Health Plans
Kelly Ellston
Union Labor Life Insurance Company
Greg Wantanabe
Wellpoint Pharmacy Management
Peggy Lynch
Banner Health
Brent Priday
Banner Health
Matthew P. McCullough
Findley Davies
Deborah A. Martin
Mercer Human Resources Consulting
Lilli Duval
Pharmaceutical Care Network
Edward A. Kaplan
Segal Co.
Ron Lyon
Towers Perrin
Glenn Randle
Sheet Metal Workers
Charles Hannaford
Pipefitters Local 537 Health Trust Fund
Daniel Ryan
UFCW
Janice Friedman
UFCW
Denise DeMaina
Blue Cross Blue Shield of Massachusetts
Michael Mulrey
Blue Cross Blue Shield of Massachusetts
John Killion

John Killion

Blue Cross Blue Shield of Massachusetts

Name & Employer
Jan Cook
Blue Cross Blue Shield of Massachusetts
Steven Fox
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Blue Cross Blue Shield of Massachusetts
Sheila Cizauskas
Blue Cross Blue Shield of Massachusetts
Sharon Smith
Blue Cross Blue Shield of Massachusetts
James Fanale
Blue Cross Blue Shield of Massachusetts
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Anthem, Inc.
Thomas E. Greenbaum
Cigna
Mary Picerno
Empire Blue Cross Blue Shield
Elizabeth Rubin
Empire Blue Cross Blue Shield
James T. Kenney
Harvard Pilgrim Health Care
Robert C. Farias
Harvard Pilgrim Health Care
Scott Wert
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Edward Lemke
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Carol Sidwell
John Deere Healthcare
Dan Dragalin
Multiplan
Reann Maxwell
University of Pittsburgh Medical Center Health Plan
Timothy Hopkins
Anthem Prescription Management
Penny Marshall
Schaller Anderson
Patricia K. Morgan
First Databank
Carole O'Brien

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VA National Acquisition Center
Steven Thomas

VA National Acquisition Center

Name & Employer
Robert James
McKesson
Jody Taylor
Cardinal Health
Dennis Lindell
AmeriSourceBergen Corporation
Zachary Dyckman
Dyckman & Associates
Arthur Steinberg
Philadelphia Federation of Teachers Health and Welfare Fund
Julie Ryberg
Formula Corp.
William Ecklund
Twin City Bakery Workers Health & Welfare Fund
Bernard Dale Jackson
Man-U Service Contract Trust Fund
William J. Einhorn
Teamsters Health and Welfare Fund of Philadelphia & Vicinity
John Rodgers
Independent Health
William A. Rhodes
Zenith Administrators
David Lambert
AmeriSourceBergen
Greg Yonko
McKesson
Kimbir L. Tate
McKesson
Ken Arruda
Blue Cross Blue Shield of Massachusetts

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THE FOLLOWING TRACK 1 DEFENDANTS

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Attorneys for Schering-Plough Corp. and Warrick Pharmaceuticals Corp.

Dated: October 10, 2006

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered on October 10, 2006 to counsel for plaintiffs and to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, via LexisNexis File & Serve.

By: /s/ Katherine B. Schmeckpeper
Katherine B. Schmeckpeper